

From: [McCormack, Craig \(ECY\)](#)
To: Kissinger.Ion@epamail.epa.gov
Subject: FW: seldovia survey review
Date: Thursday, January 10, 2013 2:00:09 PM

Have not sent this, still reviewing survey and considering review comments

From: McCormack, Craig (ECY)
Sent: Wednesday, January 09, 2013 9:16 AM
To: McCormack, Craig (ECY)
Subject: seldovia survey review

Hi Dianne

I have glanced through the Seldovia Village Tribal fish dietary survey. Thanks for providing this information to me in advance of its final publication. The Seldovia tribe has put a lot of thought and effort into this survey - I hope your office and management will be able to recognize their efforts.

I have a few observations that might help the Seldovia tribe document their fish consumption estimates and support their efforts to continue to harvest and consume fish.

Include a narrative about the Seldovia Village Tribe culture and reliance on natural resources (fish) for their subsistence based culture. It would help orient the reader if the survey provides a brief narrative associated with the Seldovia, Port Graham, Nanwalek, and Tyonek tribes-where are they, who are they, what are important characteristics of their tribal culture and are there major differences between the tribes.

Include a map of where the tribe(s) are located in Alaska, a map of Cook Inlet, and a map of where the tribe harvests fish – this provides context and important information regarding their tribal lifestyle.

The survey notes the importance of fish to the tribe but more should be written to help support the tribal cultural significance of fish and the role fish play beyond a source of protein. Consider including the following:

- include a quote from a tribal elder regarding tribal cultural reliance on fish-what a tribal elder remembers how it used to be (historical tribal harvest and consumption) as opposed to how it is now provides context and may begin to address issues of suppression;
- narrative to document tribal ceremonies – religious and other-with photos if possible – related to fish consumption; and
- photo's of fish models used and photo's of fish consumed – salmon, halibut.

The Seldovia survey report tabulates some recreational rates and draws a comparison with the CRITFC report. Please consult with the Seldovia tribal representatives to inform them that much more fish dietary information is available for the Pacific Northwest. I suggest you direct the authors of the Seldovia survey to some of the documentation used in Ecology's reports on fish consumption estimates. Tabulations and recreational fish dietary estimates

(companion document to the technical support document) are found at: URL—

It would be very helpful for the reader if the report included tribal-specific tabulations of fish consumption estimates—the tribal specific fish consumption estimates provided in Figures 4, 5, and 6 should be tabulated. The focus of the survey seems to be on determining “average” fish consumption estimates (Figures 4, 5, and 6) – why is the focus of the survey on central tendency estimates when most environmental and public health regulatory decisions are based on upper percentiles of the exposure distribution (90th percentile and above)? If possible, upper percentile fish consumption estimates should be provided and tabulated. Fish consumption estimates are provided in the absence of noting the percentile associated with the rates or any descriptive statistics for the estimates – adult and child fish consumption estimates should be tabulated along with the corresponding percentiles of the distribution. Tabulations with corresponding percentiles will provide clarity and will enable informed regulatory decisions that are health protective for the tribes.

Regarding health protective decisions for the tribe – the Seldovia survey includes information on the harvest and consumption of shellfish and selected aquatic mammals. Tribal health protective decisions and measures should consider contaminant body burdens of fish and ***other foods – specifically seals***. Any health protective measures that consider fish alone would grossly underestimate potential exposures to contaminants and potential adverse health effects for tribal members. I recommend tribal representatives consult with you to note the uncertainties regarding the range of subsistence dietary practices and the high probability of underestimating potential exposures from chemical contaminants in subsistence foods. Should health consultations be considered for these populations?